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July 31, 2024

**BY ECF**

The Honorable John G. Koeltl  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

*The Schedule is approved,  
So ordered.  
7/31/24 JGK/Koeltl  
U.S.D.S.*

**Re: *City of Almaty, Kazakhstan, et ano. v. Felix Sater, et al.*,  
Case No. 19 Civ. 2645 [rel. 15 Civ. 5345] (JGK) (KHP)**

Dear Judge Koeltl:

We represent Plaintiffs City of Almaty, Kazakhstan and BTA Bank and write in response to Your Honor's July 29 Order directing Plaintiffs to "report whether there is any agreement with respect to the sequencing of any motions or other filings." [ECF No. 678]. The parties have reached agreement on the proposed schedule below, which we respectfully request that the Court so order.

As it currently stands, Plaintiffs are to submit their proposed judgment and supporting submission by no later than August 2. [ECF No. 675]. On July 24, Defendants Felix Sater (and his companies) and MeM Energy Partners LLC submitted a "Notice of Motion Under FRCP Rule 50(b) and 59(a)" that identifies the bases for their motion but without a supporting memorandum as required under the local rules. [ECF No. 676]. Defendants initially proposed a bifurcated briefing schedule on the various grounds on which they seek to challenge the verdict and/or judgment. [ECF No. 677].

We have conferred with counsel for Defendants. The parties agree that a single, uniform briefing schedule on all post-trial submissions—including both Plaintiffs' proposed judgment and supporting submission, as well as Defendants' brief in support of their Notice of Motion—will be the most efficient way of proceeding, both for the Court and the parties. This way, the Court will be presented with all of the arguments in support of or in opposition to the judgment in one place. Accordingly, the parties respectfully request that the Court so order the following schedule for the filing of any post-trial submission:

- By no later than August 30, 2024:
  - Plaintiffs' proposed judgment and supporting submission
  - Defendants' papers in support of their Notice of Motion, [ECF 676]
- By no later than September 30, 2024:
  - Plaintiff's opposition to Defendants' post-trial motions
  - Defendants' opposition to Plaintiffs' proposed judgment
- By no later than October 21, 2024:
  - Any reply submission

BOIES SCHILLER FLEXNER LLP

**BSF**

We thank the Court for its attention to this matter.

Respectfully,

/s/ Craig Wenner

Craig Wenner